

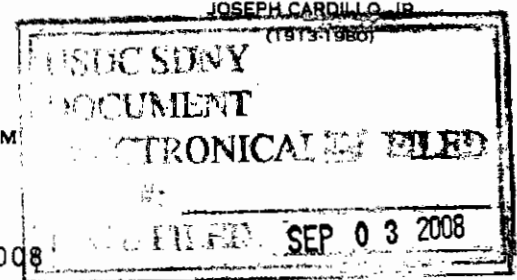
CARDILLO & CORBETT

ROBERT V. CORBETT
CHRISTOPHIL B. COSTAS
TULIO R. PRIETO
JAMES P. RAU

29 BROADWAY
NEW YORK, NY 10006
(212) 344-0464

FRANCIS H. McNAMARA
COUNSEL

FAX: (212) 797-1212/509-0961
E-MAIL: CC@CARDILLOCORBETT.COM



September 2, 2008

BY FAX(212-805-0426)

Honorable Laura Taylor Swain
United States District Judge
United States Courthouse
500 Pearl Street, Room 725
New York, New York 10007

MEMO ENDORSED

Re: Case No. 08 Civ. 1081 (LTS)
Raetsclub Marine Insurance B.V.
v. Bulkship Nigeria, Ltd.
Our File No.: E-564

Dear Judge Swain:

We are the attorneys for the plaintiff in the captioned action. We respectfully request an adjournment of the initial pretrial conference scheduled for September 5, 2008 at 10:30 a.m. as plaintiff has not yet attached sufficient funds of the defendants to secure its claim in this maritime action. The defendants have not appeared herein.

The complaint in this matter asserts a maritime claim for failure to pay marine insurance premiums. In its complaint, the plaintiff sought and the Court granted an Order of Maritime Attachment dated February 1, 2008. Pursuant to that Order, the plaintiff has made continuous service of Process of Maritime Attachment on the various garnishee banks named in the Order. Thus far, the plaintiff has only attached \$2405.00 in funds belonging to defendants. However, as plaintiff's claim is some \$93,190.20 it wants to continue service of the Process of Maritime Attachment with the expectation that funds will ultimately be restrained pursuant thereto.

The plaintiff has reserved the right to commence litigation in England against defendants pursuant to the terms of the marine insurance policies.

In view of the circumstances, we respectfully request an adjournment of the above conference to allow plaintiff to continue serving the Process of Maritime Attachment.

Respectfully yours,

CARDILLO & CORBETT

By: 

James P. Rau

JPR/lf

The conference is adjourned to
November 7, 2008, at 11:00AM.

SO ORDERED.

NEW YORK, NY 

LAURA TAYLOR SWAIN

Sept 3, 2008 UNITED STATES DISTRICT JUDGE